

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON  
TALCUM POWDER PRODUCTS  
MARKETING, SALES  
PRACTICES, AND PRODUCTS  
LIABILITY LITIGATION**

**Civil Action No. 3:16-md-2738-  
FLW-LHG  
MDL No. 2738**

***THIS DOCUMENT RELATES TO ALL CASES***

**CERTIFICATION OF P. LEIGH O'DELL, ESQ.**

P. Leigh O'Dell, Esq., hereby certifies as follows:

1. I am an attorney at law and member of the law firm of Beasley, Allen, Crow, Methvin, Portis & Miles, P.C. I was appointed as Co-Lead Counsel to represent all Plaintiffs in the above-captioned matter.

2. I submit this Certification based on personal knowledge in support of the PSC's Memorandum of Law in Opposition to Defendants Johnson & Johnson and Johnson & Johnson consumer Inc's Motion to Exclude Expert Opinions of Ghassan Saed.

3. Attached hereto as Exhibit A is a true and correct copy of the Deposition of Michael Birrer, M.D., Ph.D., dated March 29, 2019.

4. Attached hereto as Exhibit B is a true and correct copy of the Report of Dr. Ghassan M. Saed, dated November 16, 2018.

5. Attached hereto as Exhibit C is a true and correct copy of Fletcher, N., et al., *Molecular Basis Supporting the Association of Talcum Powder Use With Increased Risk of Ovarian Cancer*, Reprod. Sci., Feb. 2019.

6. Attached hereto as Exhibit D is a true and correct copy of Exhibit 12 to the Deposition of Ghassan Saed, Ph.D., dated January 23, 2019.

7. Attached hereto as Exhibit E is a true and correct copy of the Depositions of Ghassan Saed, Ph.D., dated January 23, 2019 (Exh. E-1) and February 14, 2019 (Exh. E-2).

8. Attached hereto as Exhibit F is a true and correct copy of “The role of talc powder exposure in ovarian cancer: mechanistic approach” (“budget document”).

9. Attached hereto as Exhibit G is a true and correct copy of Exhibit 23 (“Pilot Study Notebook”) to the Deposition of Ghassan Saed, Ph.D., dated February 14, 2019.

10. Attached hereto as Exhibit H is a true and correct copy of Exhibit 1 (“Publication Data”) to the Deposition of Ghassan Saed, Ph.D., dated January 23, 2019.

11. Attached hereto as Exhibit I is a true and correct copy of the Exhibit 9 (“Preliminary Study”) to the Deposition of Ghassan Saed, Ph.D., dated January 23, 2019.

12. Attached hereto as Exhibit J is a true and correct copy Fletcher, N.,

*Talcum Powder Enhances Oxidative Stress in Ovarian Cancer Cells*, Reproductive Sciences, March 1, 2018.

13. Attached hereto as Exhibit K is a true and correct copy of Society of Reproductive Investigation, General Abstract Information, SRI 2018 Annual Meeting.

14. Attached hereto as Exhibit L is a true and correct copy of Fletcher, N.,  
*Talcum Powder Enhances Cancer Antigen 125 Levels in Ovarian Cancer Cells and in Normal Ovarian Epithelial Cells*.

15. Attached hereto as Exhibit M is a true and correct copy of the September 19, 2018 e-mail to Dr. Ghassan Saed from Robert E. Bristow, MD, Editor, Gynecologic Oncology.

16. Attached hereto as Exhibit N is a true and correct copy of the October 10, 2018 *Reproductive Sciences* manuscript submission.

17. Attached hereto as Exhibit O is a true and correct copy of October 11, 2018 SRI Abstract Fee Receipt.

18. Attached hereto as Exhibit P is a true and correct copy of November 15, 2018 e-mail to Ms. Amy Harper from SGO 2019 Annual Meeting Program Committee.

19. Attached hereto as Exhibit Q is a true and correct copy December 26, 2018 e-mail from Dr. Lawrence Layman, Editor, Reproductive Sciences.

20. Attached hereto as Exhibit R is a true and correct copy of Shukla, A., et al., *Alterations in Gene Expression in Human Mesothelial Cells Correlate with Mineral Pathogenicity*, Am J Respir Cell Mol Biol, 41, 114-123 (2009).

21. Attached hereto as Exhibit S is a true and correct copy of IMERYS 248635, September 25, 2009, Regulatory Science Project Proposal. (**FILED UNDER SEAL**)

22. Attached hereto as Exhibit T is a true and correct copy of the Deposition of Brooke T. Mossman, M.S., Ph.D., dated April 8, 2019.

23. Attached hereto as Exhibit U is a true and correct copy of Buz'Zard, A, *Pycnogenol reduces Talc-induced Neoplastic Transformation in Human Ovarian Cell Cultures*, Phytother. Res. 21, 579-586 (2007).

24. Attached hereto as Exhibit V is a true and correct copy of Akhtar, MJ, et al., *The Primary role of iron-mediated lipid peroxidation in the differential cytotoxicity cause by two varieties of talc nanoparticles on A<sub>549</sub> cells and lipid peroxidation inhibitory effect exerted by ascorbic acid*, Toxicology, 24, 1139-1147 (2010).

25. Attached hereto as Exhibit W is a true and correct copy of Akhtar, MJ, et al., *Cytotoxicity and Apoptosis Induction by Nanoscale Talc Particles from*

*Two Different Geographical Regions in Human Lung Epithelial Cells*, Environ. Tech. (2012).

26. Attached hereto as Exhibit X is a true and correct copy of the Report of Jeffrey Boyd, Ph.D., dated February 25, 2019.

27. Attached hereto as Exhibit Y is a true and correct copy of the Deposition of Jeffrey A. Boyd, Ph.D., dated April 8, 2019.

28. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I may be subject to punishment.

Dated: May 29, 2019

/s/ P. Leigh O'Dell  
P. Leigh O'Dell